

ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney

MARTHA BOERSCH (CABN 126569)  
Chief, Criminal Division

DAVID J. WARD (CABN 239504)  
EVAN MATEER (CABN 326848)  
Assistant United States Attorneys

1301 Clay Street, Suite 340S  
Oakland, California 94612  
Telephone: (510) 637-3680  
Facsimile: (510) 637-3724  
david.ward@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	No. 23-CR-00428 JST
	)	
Plaintiff,	)	
	)	STIPULATION TO RESET DEADLINE TO FILE
v.	)	RESPONSE TO DEFENDANT THANDI'S
	)	REQUEST FOR APPOINTMENT OF COUNSEL;
JASBIR THANDI,	)	ORDER
	)	
Defendant.	)	

On November 16, 2023, defendant Jasbir Thandi was charged by Indictment with one count of Conspiracy to Commit Insurance Fraud in violation of 18 U.S.C. § 371, two counts of Insurance Fraud in violation of 18 U.S.C. § 1033, and two counts of Bank Fraud in violation of 18 U.S.C. § 1344. *Dkt. 1.*

On January 18, 2024, at an appointment of counsel hearing, the defendant, through counsel, submitted a sworn financial affidavit in support of his request for court-appointed counsel under the Criminal Justice Act ("CJA"). *Dkt. 32.* The government, citing evidence of defendant's Thandi's financial assets developed during its investigation, objected to the appointment of CJA counsel. *Dkt 31.* In response, the Court provisionally appointed CJA counsel to represent defendant Thandi and ordered the parties to provide further briefing regarding Mr. Thandi's request for court-appointed counsel. *Id.*

Counsel for defendant Thandi was ordered to file his opening brief no later than February 19, 2024. *Dkt. 31*. Government counsel was ordered to file a response no later than March 4, 2024. *Id.* Defendant may file a Reply by March 11, 2024. *Id.*

Defendant Thandi filed his Unopposed Administrative Motion to Seal and In-Camera Review, together with a Memorandum of Points of Authorities in Support of defendant Thandi's Request for Appointment of Counsel for in-camera review only, on February 16, 2024. The Court approved defendant Thandi's Administrative Motion to Seal and In-Camera Review on February 26, 2024, and defendant Thandi filed and served on the government a redacted Memorandum of Points of Authorities in Support of defendant Thandi's Request for Appointment of Counsel on February 26, 2024. *Dkt. 46*.

Given this timing, the parties stipulate and agree that an extension of time for the government to file its response is warranted and appropriate. Therefore, the parties stipulate and ask the Court to order the government to file its response to defendant Thandi's Request for Appointment of Counsel no later than March 18, 2024. The parties further stipulate and ask the Court to allow the defendant to file a Reply no later than March 25, 2024.

DATED: March 4, 2024

Respectfully submitted,

ISMAIL J. RAMSEY  
United States Attorney

/s/ David J. Ward  
DAVID J. WARD  
EVAN MATEER  
Assistant United States Attorneys

DATED: March 4, 2024

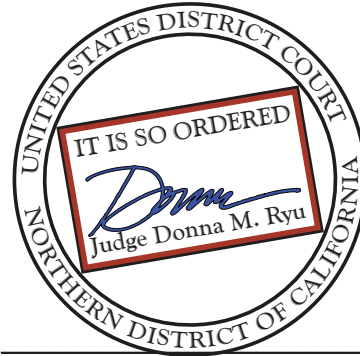
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TIMOTHY CRUDO  
MARCIA V. VALENTE  
ALEXANDER W. PREVE  
Attorneys for Defendant THANDI

**ORDER**

Based upon the stipulation of the parties, and for good cause shown, the Court hereby orders that the government file its response to defendant's Request for Appointment of Counsel no later than March 18, 2024. The Court further orders that the defendant may file a Reply no later than March 25, 2024.

**SO ORDERED**

DATED: March 5, 2024



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HON. DONNA M. RYU  
United States Chief Magistrate Judge